UNITED	STA	ATES	DIST	RICT	COURT
SOUTHE	RN	DIST	RICT	NEW	YORK

DEBORAH D. PETERSON, Personal Representative of the Estate Of James C. Knipple (Dec.), et al.

Civ. No. 10 Civ. 4518 (BSJ)(GWG)

Plaintiffs,

- against -

ISLAMIC REPUBLIC OF IRAN; BANK MARKAZI a/k/a CENTRAL BANK OF IRAN; BANCA UBAE SpA; CITIBANK, N.A., and CLEARSTREAM BANKING, S.A.,

Defendants.

DECLARATION OF SHARON L. SCHNEIER IN SUPPORT OF CITIBANK, N.A.'S RESPONSE TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

- I, Sharon L. Schneier, declare as follows:
- 1. I am a member of the bar of this Court and am a Partner at Davis Wright
 Tremaine LLP, counsel for counsel for Citibank, N.A. ("Citibank") in the above-captioned
 proceedings. I submit this Declaration in support of Citibank's Response to Plaintiffs' Motion
 for Partial Summary Judgment. I have personal knowledge of and am fully familiar with the
 facts set forth herein.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of the docket sheet in the United States Court of Appeals in *Hausler v. JPMorgan Chase Bank, N.A.*, 740 F. Supp. 2d 520 (S.D.N.Y. 2010) ("*Hausler I*") and No. 09-10289, 2012 WL 601034 (S.D.N.Y. Feb. 22, 2012, *appeal docketed*, Nos. 12-79 (2d Cir.).

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3. Attached hereto as Exhibit 2 is a true and correct copy of the docket sheet in the

United States Court of Appeals in Calderon-Cardona v. JPMorgan Chase Bank, N.A., No. 11

Civ. 3283, 2011 WL 6155987 (S.D.N.Y. Dec. 7, 2011), appeal docketed, No. 12-75 (2d Cir.).

4. Attached hereto as Exhibit 3 is a true and correct copy of the Brief for the United

States as Amicus Curiae in Support of Appellees, dated June 2012, and filed in the appeal to the

United States Court of Appeals for the First Circuit in Rubin et al. v. Islamic Republic of Iran, et

al., No. 11-2144 (1st Cir.)

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

June 15, 2012

Sharon L. Schneier